

IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA :  
:  
v. :  
: No. 4:23-CR-159  
KATRINA MACLEAN, :  
:  
Defendant. : (Chief Judge Brann)

**REQUEST FOR PRE-TRIAL DISCLOSURE OF NOTICE OF INTENT  
TO USE EVIDENCE PURSUANT TO FED. R. EVID. 609(B)**

Defendant Katrina Maclean, by and through her undersigned counsel, pursuant to Rule 609(b) of the Federal Rules of Evidence, requests from the Government pre-trial written disclosure of its intent to use any evidence which it will argue is admissible under the provisions of Rule 609(a)(1) and/or (2).

Dated: July 7, 2023

MIELE & RYMSZA, P.C.

By: s/ Edward J. Rymsza  
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**CERTIFICATE OF SERVICE**

I, Edward J. Rymsza, Esq., hereby certify that on this 7<sup>th</sup> day of July 2023, I served the foregoing Request for Pre-trial Disclosure Pursuant to Fed. R. Evid. 609(b) upon Sean Camoni, Esq. by electronic mail.

Dated: July 7, 2023

MIELE & RYMSZA, P.C.

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